

**UNITED STATES BANKRUPTCY COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Kevin Michael Keough

CHAPTER 13

Debtor(s)

CASE NO. 18-bk-03251-HWV

**AMENDED MOTION TO AUTHORIZE WAGE ATTACHMENT**

**COME NOW**, the Debtor, Kevin Michael Keough, by and through counsel, Dawn M. Cutaia, and respectfully represents:

1. The Debtor, Kevin Michael Keough, filed a Chapter 13 Petition on August 2, 2018.
2. The Debtor receives regular income from employment with York Area United Fire & Rescue which may be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will increase if the Motion for Wage Attachment is granted.

**WHEREFORE**, the Debtor respectfully requests this Court enter an Order directing the above-mentioned employer to Pay Trustee in the amount set forth in the attached Order.

Date: January 2, 2020

Respectfully Submitted,

By: **/s/ Dawn M. Cutaia**  
Supreme Court ID 77965  
Attorney for Debtor  
115 East Philadelphia Street  
York, PA 17401  
717-304-1841  
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**UNITED STATES BANKRUPTCY COURT FOR THE  
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IN RE:

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Debtor(s)

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**ORDER TO PAY TRUSTEE**

**AND NOW**, upon consideration of the above-referenced Debtor having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

**IT IS HEREBY ORDERED** that until further Order of this Court:

**Employer:** York Area United Fire & Rescue  
Attn: Lisa Einsig, Administrative Assistant  
50 Commons Drive  
York Pa 17402  
717-718-2383

**Shall deduct from Kevin Michael Keough income the sum of \$411.80 each bi-weekly pay**, beginning with the first pay in **March 2020**, and deduct this same amount each pay thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and remit the deducted sums to:

Chapter 13 Trustee  
PO Box 7005  
Lancaster PA 17604

**IT IS FURTHER ORDERED** that checks issued to the Trustee pursuant to this Order shall include the above-captioned case number on the face of the check.

**By the Court**

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,Judge